

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

Case No.: 5:18-cv-00671-JGB-KK

BELLAGIO, LLC, a Nevada  
limited liability company;  
MIRAGE RESORTS,  
INCORPORATED, a Nevada  
corporation,

Plaintiffs,

v.

BELLAGIO HAIR SALON, an  
unknown entity; REAGAN  
ROGERS, an individual,

Defendants.

**STIPULATION AND ORDER  
FOR PERMANENT  
INJUNCTION**

13 WHEREAS, Plaintiff Bellagio, LLC and Mirage Resorts, Incorporated  
14 (“Plaintiffs” or “Bellagio”) brought this action against Redlands Moving &  
15 Storage, Inc. dba Bellagio Hair Salon and Reagan Rogers (“Defendants”)  
16 alleging claims for trademark infringement, trademark dilution, unfair  
17 competition, cybersquatting and common law claims in connection with the  
18 use of the BELLAGIO mark at a hair salon located at 16960 Van Buren  
19 Blvd., Riverside, California 92504;

20 WHEREAS, Defendants consent to entry by the Court of a permanent  
21 injunction restraining Defendants from further unauthorized use of the  
22 BELLAGIO mark in any format or font, and marks confusingly similar to the  
23 BELLAGIO mark; and

24 NOW THEREFORE, IT IS ORDERED, ADJUDGED, AND  
25 DECREED that:

26 1. Defendants, their agents, attorneys, representatives, employees,  
27 and all persons in active concert or participation with them who receive  
28 notice hereof, are hereby permanently enjoined from any unauthorized use of

1 BELLAGIO mark in any format or font, and any marks confusingly similar  
2 thereto; and

3 2. This case is dismissed with prejudice, with each party to bear  
4 their own attorneys' fees and costs.

5 Entered this 7th day of August, 2018.

6 **IT IS SO AGREED AND STIPULATED.**

7 BY PLAINTIFF:

BY DEFENDANTS:

8 LEWIS ROCA  
9 ROTHGERBER CHRISTIE LLP

LAW OFFICES OF LAWRENCE  
R. BYNUM, A PROFESSIONAL  
CORPORATION

10 Michael J. McCue (SBN: 296425)  
11 MMcCue@LRRC.com  
12 Aaron D. Johnson (SBN: 261747)  
13 ADJohnson@LRRC.com  
14 4300 Bohannon Drive, Suite 230  
Menlo Park, CA 94025  
Tel: (702) 949-8200  
Fax: (702) 949-8398

15 *Attorneys for Plaintiffs*  
16 *Bellagio, LLC, and*  
*Mirage Resorts, Incorporated*

10 Lawrence R. Bynum (SBN:  
11 176588)  
12 LBynum@realpropertyattorney.net  
13 6700 Indiana Avenue, Suite 240  
14 Riverside, CA 92506-4258  
Tel: (951) 682-2345  
Fax: (951) 682-2324

*Attorneys for Defendant*  
*Redlands Moving & Storage, Inc.,*  
*dba Bellagio Hair Salon*  
*and Reagan Rogers*

19 **IT IS SO ORDERED:**

20   
21 UNITED STATES DISTRICT JUDGE

22 DATED: September 17, 2018

4300 Bohannon Drive  
Suite 230  
Menlo Park, CA 94025

Lewis Roca  
ROTHGERBER CHRISTIE